

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

ROOT, INC., et al.,

Plaintiff,

vs.

BRINSON CALEB SILVER

Defendants.

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**Case No. 2:23-cv-512
Judge Sarah D. Morrison
Magistrate Judge Elizabeth A.
Preston Deavers**

**RECEIVER’S INITIAL INTERIM REPORT, RECEIVERSHIP PLAN
AND APPLICATION FOR FEES AND EXPENSES OF RECEIVER AND
COUNSEL TO RECEIVER COVERING THE PERIOD
MAY 12, 2023 THROUGH JUNE 17, 2023**

In accordance with the requirements of this Court’s *Order*, filed May 12, 2023, *Order Appointing Receiver*, filed May 17, 2023, and *Order Amending Order Appointing Receiver*, filed June 7, 2023 (hereinafter collectively “Receiver Order”), Jerry E. Peer, Jr. (“Receiver”), began the process of taking possession and/or control of all monetary and real property assets of Mr. Brinson Caleb Silver, Collateral Damage, LLC and Eclipse Home Design, LLC (hereinafter collectively “Defendants”). Pursuant to the Receiver Order and 28 U.S.C. §§ 754, 959 and 1692, Rule 66 of the Federal Rules of Civil Procedure, Receiver has completed this Initial Interim Report and Receivership Plan and accompanying schedules (“Initial Report”), which covers the period from May 12, 2023 through and including June 17, 2023 (the “First Interim Period”).

I. INTRODUCTION

By way of the Receiver Order, Receiver was appointed to assume complete control and oversight all monetary and real property assets of Defendants. In an effort to identify assets of Defendants, Receiver’s counsel first met with Mr. Silver on May 12, 2023 to inquire as to the type

and whereabouts of Defendants' assets. Subsequently, on May 18, 2023, Receiver delivered specific requests to Mr. Silver inquiring as to the assets of Defendants. As of the date of this Initial Report, Mr. Silver has been less than forthcoming with information necessary to both take possession of Defendants' assets and secure same. Mr. Silver's reluctance and/or refusal has been the subject of multiple hearings before this Court, during which Mr. Silver has asserted his Fifth Amendment privilege and refused to provide any additional information to Receiver at this time.

Despite Mr. Silver's refusal to provide complete answers to Receiver's inquiries or requested documents, Receiver has identified various assets as well as endeavored to examine the bank accounts and track the funds of Defendants. Through Receiver's efforts and with the assistance of Plaintiff, Receiver has identified the assets documented in this Interim Report and revealed various transfers of cash and/or sales of assets by Defendants, which are being further investigated to determine whether there may be a recovery of the asset or related cash proceeds.

In addition to the above, Receiver immediately consulted with various real estate property managers and counsel licensed in Florida and California, in order to assist with securing the real estate assets in each respective state as well as any other actions that may be necessary to preserve and ultimately sell the real estate. Receiver intends to file separate motions to employ each professional deemed necessary to assist with fulfilling Receiver's responsibilities.

II. RECEIVERSHIP PLAN

This Initial Report will set forth (1) Receiver's intentions moving forward with regard to both identifying and taking control of assets as well as liquidating assets of value; (2) a statement of assets in Receiver's possession or under his control; (3) anticipated transactional costs to be incurred; (4) anticipated duration of the administration of this estate; (5) engagement of professionals to carry out Receiver's responsibilities; (6) estimated date by which an appraisal and sale by Receiver can occur and whether it will be public and/or private sales of the real property;

and (7) any litigation or administrative proceedings that are underway or anticipated.

1. Receiver's Goal/Expectations For Administration.

During the First Interim Period, Receiver and his counsel has devoted all efforts to identifying and securing the various assets of Defendants. In light of certain information received and records obtained, Receiver had and continues to have concern that Mr. Silver was attempting to and has liquidated certain assets and moved funds to accounts existing outside the jurisdiction of this Court. During the coming months Receiver will continue to investigate the sale of assets and transfer of cash proceeds prior to Receiver's appointment to determine if any may be recovered. While Receiver has information related to certain bank accounts in Defendants' names, based upon information and belief, there may be and likely are other accounts that have not been previously disclosed to or discovered by Receiver. Considering the nominal balances remaining in the known accounts, Receiver has reasons to believe there may be significant funds in other accounts.

In addition to the above, Receiver has and will continue to secure certain assets of Defendants, including but not limited to real estate, vehicles, watercraft, and other high value personal property believed to be in Mr. Silver's possession or under his control. Again, due to Mr. Silver's lack of cooperation with identifying assets and providing information and records requested, it is taking additional time for Receiver to secure the assets. This will be a primary objective of Receiver in the coming weeks and months.

When and while assets are being secured, Receiver is inquiring as to the best method of liquidation for each asset in order to maximize value and recovery. For example, Receiver has engaged in preliminary discussions with both real estate brokers and auctioneers to determine the best method of sale for the remaining three (3) properties. In addition, Receiver will be engaging property managers in Florida and California to assist with securing and maintaining the properties

until sold. Any other assets that come into the possession of or under the control of Receiver will undergo a similar analysis. Court approval will be requested and obtained prior to any assets being sold.

3. Statement of Assets.

Most notably, the assets of Defendants consist of the real property identified in these proceedings. As this Court is aware, the property located at 13105 Biscayne Island Terrace, Miami Florida was sold on May 28, 2023, pursuant to a Real Estate Purchase Contract entered into by Eclipse Home Design, LLC prior to Receiver's appointment. The net proceeds recovered from that sale was \$570,811.34, which are currently held by Receiver. A copy of the ALTA Settlement Statement is attached hereto as "Exhibit A."

Receiver has also inspected the real estate located at 9125 Bayshore Drive, Miami Florida. Upon Receiver's appointment, it was believed that the fair market value of this property may exceed over \$5,000,000. However, it was later discovered that the property had undergone significant demolition and was in the beginning stages of remodeling. As of the date of this First Interim Report, the property is uninhabitable and in need of significant work/renovation. It has been estimated that the work necessary to complete the home will exceed \$700,000. This amount does not include the roughly \$100,000 still owed to Kabco Kitchens, the contractor performing the renovations. Any renovations that would be undertaken by Receiver would require the past due balance to Kabco Kitchens to be paid as it holds the permit to complete the work. The time for obtaining a permit in Miami Florida to do the work necessary can, and typically does, exceed 6-9 months. This property is also subject to a pending foreclosure action which Receiver has filed a motion to stay pending the conclusion of the administration of this estate or sale of the property. At this time, Receiver has not made a determination as to the most beneficial and equitable means of selling this property.

Receiver has communicated with a property manager in California who has conducted drive-by inspections of 2543 Walnut Avenue, Venice California, and 19803 Vista Del Otero, Ramona California properties. In addition, Receiver will be conducting a walk-through inspection of each property during a trip from July 16 through July 18. In light of Mr. Silver's testimony to the Court on June 26, 2023, Receiver has requested that the locks on the Ramona property be changed. Receiver has also attempted to make contact with Ms. Laurie Mannette, who is believed to be currently residing at the Walnut Avenue property, in order discuss her vacating the property or paying monthly fair market rent to Receiver until the property is sold.

Receiver located an amphibious airplane docking system that was purchased by Defendants in April 2022 from ICON Aircraft located in Vacaville, California. The dock is valued at approximately \$23,000 and Receiver is taking steps to secure and liquidate this asset.

In addition, Receiver has identified a 2022 Yamaha FX HO with Audio Wave Runner ("Wave Runner"). The Wave Runner was abandoned by Mr. Silver at the 13105 Biscayne Island Terrace property and Receiver first learned of the Wave Runner after the closing of the sale of that Property. Receiver has since assessed the condition of the Wave Runner, which was found to be damaged. As a result, Receiver obtained preliminary estimates as to the costs to repair and current value of the Wave Runner. Without damage, the Wave Runner was estimated to be worth \$13,000 or less. As a result, Receiver has offered the new owners of the Biscayne Island Terrace property to obtain Court approval for a purchase price of \$10,000. Selling the Wave Runner in this fashion will eliminate the costs associated with removal, storage, and/or repair as well as commissions or other related expenses.

Receiver is also aware of certain vehicles located in California, which Mr. Silver has represented are subject to lease agreements. As of this time, Receiver has no additional information related to these vehicles but has submitted requests to the California Department of

Motor Vehicles and intend to inspect the vehicles while in California in July.

Lastly, Receiver believes there may be several items of jewelry, which were purchase with funds obtained from Plaintiff that are still in Mr. Silver's possession or which have been given to certain acquaintances of Mr. Silver. Receiver is making efforts to locate these items and will update this report upon receiving new information or obtaining possession of the jewelry.

Except as reported above, Receiver is not aware at this time of any additional assets of Defendants.

4. Anticipated Transactional Costs and Administrative Expenses

It is difficult for Receiver to project the anticipated transactional and administrative costs of this estate. While certain expenses are customary and expected, such as administrative fees, utilities, insurance, and other related operating expenses, costs are highly variable and may fluctuate greatly. Receiver expects to incur certain fees, commissions, and expenses associated with the liquidation of the assets and further administration of the estate. The anticipated costs will also depend greatly on success of taking control of the real estate and liquidating the assets in a cost-efficient manner.

5. Duration of this Receivership.

Based upon this plan and Receiver's initial research, it is estimated that the duration of this receivership estate is six (6) to nine (9) months. This estimated duration is largely dependent upon the success of Receiver to identify and take possession of additional assets, negotiating a proposed sale of the respective assets, and the approval of any such sale by this Court.

6. Engagement of Professionals.

Receiver has engaged in negotiations with property managers in both Florida and California to assist with securing and maintaining the respective properties until sold. In addition, subject to this Court's approval, Receiver has engaged legal counsel in state to address pending

litigation as well as being actions for eviction if necessary. Lastly, Receiver expects to engage appraisers (if necessary), real estate brokers and/or auctioneers to assist with selling the properties. Any such engagement(s) will be subject to this Court's prior approval.

7. Estimated Date of Appraisal and Sale.

In an effort to reduce costs and for the time being, Receiver is presently relying on valuation information previously provided by Plaintiff and value estimates provided by real estate brokers and managers. Should Receiver determine at a later date that an appraisal or other valuation is necessary for the property(ies), Receiver will immediately obtain such appraisal and provide same to the Court and parties. Receiver is not including valuation information in this Initial Report in an effort not to publicly disclose same to any potentially interested buyers. Receiver will provide all information in its possession to the Court or any party upon request.

Notwithstanding the above, due to the nature of Defendants' business, it is difficult for Receiver to estimate at this time how long it may take to receive an offer for the real estate and any other assets not sold at public sale.

8. Litigation and Administrative Proceedings

Receiver reports that at this time he is only aware of a pending foreclosure action filed in Dade County, Florida against the Bayshore Drive property. As stated previously, Receiver has filed a motion to stay those proceedings but a ruling has not yet been entered. Should any additional proceedings be initiated or discovered, Receiver will immediately file a Suggestion of Stay, pursuant to the terms of this Court's Receiver Order.

III. CLAIMS

Receiver has identified various creditors/claimants of Defendants. Receiver has provided notice of the receivership to all known creditors/claimants of Defendants for which Receiver has valid addresses. As claims are received, a creditor matrix will be provided with subsequent interim

reports, identifying the claimant and amount of each claim. Receiver notes for the Court no independent analysis or review of the validity or allowance of such claims will be undertaken by Receiver until assets of the receivership estates are sold, at which time any claims will be reviewed and a recommendation as to the treatment of those claims will be submitted by Receiver.

IV. FEES AND EXPENSES

1. Receiver Fees and Expenses.

As required by the Receiver Order, Receiver is making application to the Court for interim allowance of compensation and reimbursement of out-of-pocket expenses. Please note that while Mr. Jerry E. Peer, Jr. was appointed as Receiver, due to the volume of work necessary, both Mr. Gregory S. Peterson and Mr. Istvan Gajary have performed certain services and billed that time at the Receiver rate of \$150 per hour rather than the counsel rate of \$250 per hour to assist with controlling the costs of administration. A detailed summary of activity for Receiver is attached hereto as “Exhibit B”. Receiver requests allowance and payment of interim compensation and expenses in the amount of \$20,686.74 to compensate Receiver for the hours expended and expenses incurred during the First Interim Period.

2. Peterson Connors LLP Fees and Expenses.

Pursuant to the Receiver Order, Receiver employed the services of Mr. Peer, Mr. Peterson, and Mr. Gajary of Peterson Connors LLP (collectively “PetersonConnors”) as its legal counsel. Receiver requests interim allowance and payment of compensation to PetersonConnors in the amount of \$49,962.50 for services rendered to Receiver and \$6,924.78 for expenses incurred during the First Interim Period. Attached hereto as “Exhibit C” is the itemization setting forth the breakdown of time expended and costs advanced by PetersonConnors during the First Interim Period.

3. Other Administrative Reimbursement

In addition to the fees and expenses of Receiver identified above, Receiver has also been provided an invoice from Air Pros for services and parts related to repairing the air conditioning unit/system at the 13105 Biscayne Island Terrace property. This work was necessary in order to remediate certain issues identified by the buyers of the property. This invoice was paid in full by Ms. Kristin Hess, seller's agent. A copy of the invoice is attached hereto as "Exhibit D."

Receiver requests authority to reimburse Ms. Hess, in the amount of \$2,788.00 as this cost was incurred subsequent to Receiver's appointment and therefore qualifies as an administrative expense, which benefitted the estate.

V. CONCLUSION

Receiver respectfully submits this Initial Report and further respectfully requests that this Initial Report and Receiver's First Interim Application for Allowance and Payment of Fees and Reimbursement of Expenses be approved.

Respectfully submitted,

PETERSON CONNERS LLP

/s/ Jerry E. Peer, Jr.
Gregory S. Peterson (0061915)
Jerry E. Peer, Jr. (0075128)
Istvan Gajary (0089084)
545 Metro Place South, Suite 435
Dublin, Ohio 43017
Telephone: (614) 365-7000
Facsimile: (614) 220-0197
E-mail: gpeterson@petersonconners.com
jpeer@petersonconners.com
igajary@petersonconners.com
Counsel for Receiver, Jerry E. Peer, Jr.

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was filed electronically on this 29th day of June, 2023 with the Clerk of Court using the CM/ECF system. Service will be made through the Court's CM/ECF system on all parties and attorneys so registered, and all parties may access this filing through the Court's system.

A copy was also sent by regular U.S.P.S. mail and by electronic mail to the following:

Paige McDaniel
5576 Alexanders Lake Road
Stockbridge, GA 30281

/s/ Jerry E. Peer, Jr.

Jerry E. Peer, Jr. (0075128)

American Land Title Association	ALTA Settlement Statement - Combined TRID Rates Adopted 05-01-2015
Settlement Agent: Nerdinsky Law, P.A. Settlement Location: 2847 Hollywood Blvd, Hollywood, Florida 33020 File No./Escrow No.: 23-366 Print Date & Time: 5/26/23 at 3:36 pm	
Property Address: 13105 Biscayne Island Terrace, North Miami, Florida 33181 Buyer: Yossi Liani and Ayelet Suzi Bazon Seller: Eclipse Home Design LLC Lender: Citibank N.A., ISAOA Loan ID #: 4790193496 Settlement Date: 5/28/2023 Disbursement Date: 5/30/2023	

Seller		Description	Borrower/Buyer	
Debit	Credit		Debit	Credit
		Financial		
	\$2,975,000.00	Sale Price of Property	\$2,975,000.00	
		Deposit		\$150,000.00
		Loan Amount to Citibank N.A., ISAOA		\$2,082,500.00
		Lender Credits		\$5,206.25
		Prorations/Adjustments		
\$5,964.92		County Taxes 01/01/23 to 05/28/23		\$5,964.92
		Loan Charges to Citibank N.A., ISAOA		
		Application Fee (POC B \$175.00) to Citibank N.A., ISAOA		
		Commitment fee to Citibank N.A., ISAOA	\$915.00	
		Appraisal Fee (POC B \$960.00) (PBO \$75.00) to SOLIDIFI	\$15.00	
		Credit Report Fee (POC B \$25.20) to Equifax (CMI Credit Report)		
		Flood Certification to CoreLogic	\$5.65	
		Tax Service fee to CoreLogic	\$70.00	
\$12.00		eRecording to Nerdinsky Law, P.A.	\$8.00	
		FedEx to Nerdinsky Law, P.A.	\$100.00	
		Mobile Notary Fee to Osias Notary	\$200.00	
\$254.00		Municipal Tax and Lien Search to REAL RES		
\$200.00		Remote Notary to NotaryCam		
\$1,000.00		Seller Doc Prep/Payoff Correspondence to Nerdinsky Law, P.A.		
		Settlement fee to Nerdinsky Law, P.A.	\$1,750.00	
\$125.00		Title search fee to Attorney Title Fund Services, LLC		
\$60.00		Wire Fee to Nerdinsky Law, P.A.		
		Homeowner's Insurance Premium to Citizens Property Insurance Corp.	\$13,259.00	
		Prepaid Interest (256.75 per day from 05/30/23 to 06/01/23) to Citibank N.A., ISAOA	\$513.50	
		Flood Insurance Premium (POC B \$2769.00)		
		Impounds		
		Homeowner's Insurance \$1104.92 per month for 3 mo. to Citibank N.A., ISAOA	\$3,314.76	
		Property Taxes \$1234.24 per month for 9 mo. to Citibank N.A., ISAOA	\$11,108.16	
		Insurance Flood \$230.75 per month for 3 mo. to Citibank N.A., ISAOA	\$692.25	
		Aggregate Adjustment to Citibank N.A., ISAOA		\$7,405.49
		Title Charges & Escrow / Settlement Charges		
		Title - Lender's Title Endsmnts to Old Republic Nat. Title/Nerdinsky Law	\$803.13	
		Title - Lender's Title Insurance to Old Republic Nat. Title/Nerdinsky Law	\$7,781.25	
		Title - Owner's Title Insurance (optional) to Old Republic Nat. Title/Nerdinsky Law	\$2,481.87	

Note: POC B: Paid Outside Closing by the Borrower/Buyer, POC S: Paid Outside Closing by the Seller, PBO: Paid by Other.

File 23-366

Acknowledgement

The undersigned hereby certify that they have carefully reviewed the Closing Disclosure or other settlement statement form and they approve and agree to the payment of all fees, costs, expenses and disbursement as reflected on the Closing Disclosure or other settlement statement form to be paid on their behalf. We further certify that we have received a copy of the Closing Disclosure or other settlement statement.

16/1
Yossi Liapi

Date **MAY 28 2023**

Ayelet Suzi Bazon
Ayelet Suzi Bazon

Date **MAY 28 2023**

Eclipse Home Design LLC
a Delaware limited liability company

By: _____ Date _____
Brinson Silver
Sole Member

By: _____ Date _____
Jerry Peer, Jr.
as court appointed receiver in Case no. 23-CV-512

I have reviewed the Closing Disclosure, the settlement statement, the lender's closing instructions and any and all other forms relative to the escrow funds, including any disclosure of the Florida title insurance premiums being paid, and I agree to disburse the escrow funds in accordance with the terms of this transaction and Florida law.

Nerdinsky Law, P.A.

By: _____

Note: POC B: Paid Outside Closing by the Borrower/Buyer, POC S: Paid Outside Closing by the Seller, PBO: Paid by Other.

Acknowledgement

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Yossi Liani _____ Date _____

Ayelet Suzi Bazon _____ Date _____

Eclipse Home Design LLC
a Delaware limited liability company

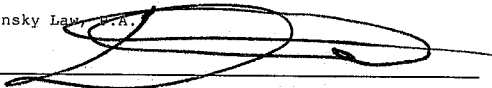
By: X 2 _____ Date May 24, 2023
Brinson Silver (May 24, 2023 05:33 PM)
Brinson Silver
Sole Member

By: _____ Date _____
Jerry Peer, Jr.
as court appointed receiver in Case no. 23-CV-512

I have reviewed the Closing Disclosure, the settlement statement, the lender's closing instructions and any and all other forms relative to the escrow funds, including any disclosure of the Florida title insurance premiums being paid, and I agree to disburse the escrow funds in accordance with the terms of this transaction and Florida law.

Nerdinsky Law, P.A.

By: _____



Note: POC B: Paid Outside Closing by the Borrower/Buyer, POC S: Paid Outside Closing by the Seller, PBO: Paid by Other.

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Yossi Liani Date _____

Ayelet Suzi Bazon Date _____

Eclipse Home Design LLC
a Delaware limited liability company

By: _____ Date _____

Brinson Silver
Sole Member

By: _____ Date 05/27/2023

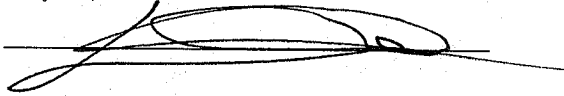
Jerry Pear, Jr.

as court appointed receiver in Case no. 23-CV-512

I have reviewed the Closing Disclosure, the settlement statement, the lender's closing instructions and any and all other forms relative to the escrow funds, including any disclosure of the Florida title insurance premiums being paid, and I agree to disburse the escrow funds in accordance with the terms of this transaction and Florida law.

Nerdinsky Law, P.A.

By: _____



Note: POC B: Paid Outside Closing by the Borrower/Buyer, POC S: Paid Outside Closing by the Seller, PBO: Paid by Other.

Peterson Connors LLP

INVOICE

545 Metro Place South, Suite 435
 Dublin, OH 43017
 United States
 (614) 365-7000

Invoice # 7000
 Date: 06/23/2023

United States Southern District

Receiver / Root, et al. v. Silver, et al., 2:23cv512

Services

Date	Notes	Timekeeper	Quantity	Rate	Total
05/13/2023	Attention to several emails re: first steps and meeting with plaintiff.	Jerry E. Peer, Jr.	0.40	\$150.00	\$60.00
05/15/2023	Review of records from Plaintiff.	Jerry E. Peer, Jr.	0.80	\$150.00	\$120.00
05/16/2023	Review of records from Plaintiff.	Jerry E. Peer, Jr.	4.20	\$150.00	\$630.00
05/17/2023	Preparing for and attending meeting with Plaintiff's counsel. Meeting with G Peterson and I Gajary re: next steps.	Jerry E. Peer, Jr.	3.70	\$150.00	\$555.00
05/18/2023	Review of title commitment, deed, payoff request and other documents related to sale of 13105 Biscayne re. Email to Dina Nerdinsky re: deed and related matters. Drafting Notice letter to creditors. Review of bank account and other information provided by Plaintiff. Attention to setting up receivership bank account.	Jerry E. Peer, Jr.	4.80	\$150.00	\$720.00
05/19/2023	Continued review of material from Vorys (bank statements, etc.); attention to emails with Dina Nerdinsky and others; prepare for telephone call with counsel for witness.	Istvan Gajary	3.20	\$150.00	\$480.00
05/19/2023	Review bank records for Jocelyn Binder transfers.	Gregory Peterson	4.30	\$150.00	\$645.00
05/19/2023	Review of deed. Attention to emails from D Nerdinsky re: deed.	Jerry E. Peer, Jr.	0.50	\$150.00	\$75.00
05/22/2023	Continued review of bank records in preparation for call with J. Binder lawyers	Gregory Peterson	5.20	\$150.00	\$780.00

EXHIBIT B

	tomorrow.				
05/22/2023	Review of records provided by Plaintiff. Phone call with Defendant's counsel. Phone call with G Peterson and I Gajary.	Jerry E. Peer, Jr.	2.40	\$150.00	\$360.00
05/23/2023	Phone calls with G Peterson, I Gajary, M. Haft, J Secrest, D Nerdinsky and Court re: various matters. Review of closing documents related to 13105 Biscayne.	Jerry E. Peer, Jr.	2.80	\$150.00	\$420.00
05/24/2023	Drafting letter to creditors and proof of claim form. Review of notice/letter to parties with information related to assets.	Jerry E. Peer, Jr.	1.00	\$150.00	\$150.00
05/25/2023	Attention to emails re: Miami 2 home and contractors related thereto. Review of photographs of property. Review of bank statements reflecting PayPal account(s). Attention to emails re: possible boat owned by Mr. Silver.	Jerry E. Peer, Jr.	1.50	\$150.00	\$225.00
05/25/2023	Continued review of financial information; identification of \$87k transferred to undisclosed PayPal account; identification and research into undisclosed yacht "Finer Seas" including possible location of its sale in Miami; review of initial document production from Silver; telephone call and update email to GSP and JEP about conversation with Carlos of KabCo Kitchens regarding conditions of Bayshore property; attention to numerous related emails.	Istvan Gajary	7.30	\$150.00	\$1,095.00
05/26/2023	Continued review of records and follow up on various receivership items; attention to numerous emails with GSP and JEP.	Istvan Gajary	2.50	\$150.00	\$375.00
05/26/2023	Attention to several emails re: records and assets. Attention to identifying/locating assets and protecting same.	Jerry E. Peer, Jr.	3.30	\$150.00	\$495.00
05/30/2023	Meeting with JEP to arrange for trip to Florida and to secure Venice California property on Walnut Street.	Gregory Peterson	2.40	\$150.00	\$360.00
05/30/2023	Phone calls with G Peterson re: properties and production. Review of latest filings.	Jerry E. Peer, Jr.	0.80	\$150.00	\$120.00
05/30/2023	Research in effort to identify location of residence of Silver; telephone call and emails with Bruce Leffers in effort to locate yacht; emails with JEP and GSP about various receivership items; initial review of subpoena response from PayPal including 4,800 lines of financial transaction data; research into various recipients of Silver's transactions, including identification of individuals and possible	Istvan Gajary	7.10	\$150.00	\$1,065.00

	witnesses; review of supplemental production of documents and information from Silver.				
05/30/2023	Attention to emails re: various matters. Online search for real estate records and other assets.	Jerry E. Peer, Jr.	1.40	\$150.00	\$210.00
05/31/2023	Review of both productions from Mr. Silver. Attention to emails from G Peterson and I Gajary re: California property manager and production from Mr. Silver.	Jerry E. Peer, Jr.	1.40	\$150.00	\$210.00
05/31/2023	Attention to numerous emails and telephone calls about case; contact counsel for mortgagor at Bayshore property in effort to get payoff balance; continued review of financial records.	Istvan Gajary	2.00	\$150.00	\$300.00
06/01/2023	Reviewing bank records and other discovery obtained by Plaintiffs and turned over by Silver. Attention to emails regarding notice of appearance and conference on status of turnover.	Jerry E. Peer, Jr.	3.50	\$150.00	\$525.00
06/01/2023	Prepare and file notice of appearance; attention to numerous emails; locate "Finer Seas" in Miami; initial review of information from Nomad Capitalist including audio records; review of corresponding financial records.	Istvan Gajary	4.20	\$150.00	\$630.00
06/02/2023	Review of production from Nomad Equities. Attention to file and review of financial records. Phone calls with counsel and Court re: latest developments. Conducting search for undisclosed assets. Phone call with N Akiva re: the Walnut Avenue property.	Jerry E. Peer, Jr.	7.30	\$150.00	\$1,095.00
06/02/2023	Continued review of Nomad Capitalist response and audio recordings; continued review of financial records and research California properties; identification of undisclosed fourth property (19803 Vista Del Otero); research into ownership of 8331 Bleriot Ave. property; telephone call and emails with Seashore Title in effort to get information; telephone call and emails with Yacht 360 in effort to get records about yacht "Finer Seas"; identification of hull number of yacht; telephone call with AUSA about case facts; telephone call with Court; telephone call with Options Lending's president about Silver's financing of the four properties and discussion of possible other properties.	Istvan Gajary	8.00	\$150.00	\$1,200.00
06/05/2023	Attention to emails and texts from G Peterson and I Gajary. Preparing for conference with court and meeting with US Attorney. Conference call with Court.	Jerry E. Peer, Jr.	2.80	\$150.00	\$420.00
06/06/2023	Phone calls with CA counsel and property	Jerry E. Peer, Jr.	0.90	\$150.00	\$135.00

	manager re: control of properties.				
06/07/2023	Attention to emails with Shellpoint and Invictus Capital Partners; follow up on securing local counsel to file receivership papers in District Court; continued review of financial records.	Istvan Gajary	5.50	\$150.00	\$825.00
06/07/2023	Phone call with G Peterson re: filing notice of case in CA.	Jerry E. Peer, Jr.	0.40	\$150.00	\$60.00
06/08/2023	Continued review of records and preparation for trip to Florida; prepare and issue subpoena to Shellpoint; follow up on filing Amended Complaint and receivership appointment and reappointment order in Florida and California district courts for three properties; research potential fifth property identified in Zelle subpoena response records; review Zelle subpoena response provided by Vorys.	Istvan Gajary	6.50	\$150.00	\$975.00
06/09/2023	Phone call with G Peterson re: several matters re: properties.	Jerry E. Peer, Jr.	0.30	\$150.00	\$45.00
06/09/2023	Attention to several emails re: assets/accounts and related matters. Preparing for trip to Miami, FL.	Jerry E. Peer, Jr.	3.30	\$150.00	\$495.00
06/11/2023	Travel to Miami, FL. Meeting with G Peterson and I Gajary in preparations for meetings and property inspection.	Jerry E. Peer, Jr.	7.00	\$150.00	\$1,050.00
06/12/2023	Preparing for and attending several meetings and property inspection.	Jerry E. Peer, Jr.	10.00	\$150.00	\$1,500.00
06/13/2023	Inspection of Silver's personal property at Bayshore property and in the storage locker of K Hess. Returning to Columbus, OH.	Jerry E. Peer, Jr.	11.00	\$150.00	\$1,650.00
06/14/2023	Review of new information obtained from Miami visit. Meeting with counsel and AUSA.	Jerry E. Peer, Jr.	2.40	\$150.00	\$360.00
06/16/2023	Phone call with G Peterson re: various issues. Review of emails.	Jerry E. Peer, Jr.	0.50	\$150.00	\$75.00

Services Subtotal \$20,490.00

Expenses

Date	Notes	Quantity	Rate	Total
05/18/2023	Payment of bond to United States District Court; Check 10346	1.00	\$100.00	\$100.00
05/19/2023	Payment to Checks in The Mail for purchase of safety business checks	1.00	\$96.74	\$96.74

Expenses Subtotal \$196.74

Invoice # 7000 - 06/23/2023

Subtotal	\$20,686.74
Total	\$20,686.74

Statement of Account

Outstanding Balance	New Charges	Amount in Trust	Payments Received	Total Amount Outstanding
(\$0.00	+ \$20,686.74) - (\$0.00	+ \$0.00) = \$20,686.74

Please make all amounts payable to: Peterson Conners LLP

Payment is due upon receipt.

Payments more than 30 days overdue incur 1.5% per month interest charges.

Please notify us if your contact information has changed.

Our Tax ID: 20-8129097

Peterson Connors LLP

INVOICE

545 Metro Place South, Suite 435
 Dublin, OH 43017
 United States
 (614) 365-7000

Invoice # 7001
 Date: 06/23/2023

United States Southern District

Attorney / Root, et al. v. Silver, et al., 2:23cv512

Services

Date	Notes	Timekeeper	Quantity	Rate	Total
05/12/2023	Telephone conference with Jerry Peer regarding a turnover checklist for the records needed; attention to emails.	Catherine J. Schwartz	0.20	\$125.00	\$25.00
05/12/2023	Telephone call with G Peterson and initial review of amended complaint; attend Plaintiff's motion hearing on appointment of receiver; discuss case with counsel for Plaintiff; examination of Defendant, BC Silver, as to location and status of assets.	Istvan Gajary	4.20	\$250.00	\$1,050.00
05/12/2023	Multiple phone calls with G Peterson and I Gajary re: appointment as receiver. Review of pleadings.	Jerry E. Peer, Jr.	1.80	\$250.00	\$450.00
05/12/2023	Consultations with team regarding appointment and immediate first steps.	Gregory Peterson	2.00	\$250.00	\$500.00
05/14/2023	Review of pleadings. Outline of initial steps to control assets. Phone call with G Peterson and I Gajary re: next steps.	Jerry E. Peer, Jr.	1.50	\$250.00	\$375.00
05/14/2023	Review amended complaint and numerous other documents related to case facts.	Istvan Gajary	3.00	\$250.00	\$750.00
05/15/2023	Intake and inventory of documents, indexing them for Atty. Peterson and then discuss the same; attention to emails.	Catherine J. Schwartz	1.10	\$125.00	\$137.50
05/15/2023	Continued review of docket and numerous filings; telephone call with anticipated counsel for Silver; attention to numerous	Istvan Gajary	4.50	\$250.00	\$1,125.00

EXHIBIT C

	related email; prepare proposed receivership order; initial review of documents from Vorys.				
05/15/2023	Attention to draft order appointing receiver.	Jerry E. Peer, Jr.	1.40	\$250.00	\$350.00
05/15/2023	Review Amended Complaint, TRO motions and Orders, multiple other docket items and filings.	Gregory Peterson	1.30	\$250.00	\$325.00
05/15/2023	Review of docket and pleadings.	Jerry E. Peer, Jr.	2.40	\$250.00	\$600.00
05/16/2023	Continued review of court docket and review of information from Vorys; attention to emails and discussions with co-counsel.	Istvan Gajary	8.00	\$250.00	\$2,000.00
05/16/2023	Attention to emails re: order appointing receiver. Phone call with court re: same.	Jerry E. Peer, Jr.	0.50	\$250.00	\$125.00
05/17/2023	Review materials in preparation for and attending meeting with counsel for Plaintiffs.	Gregory Peterson	2.60	\$250.00	\$650.00
05/17/2023	Meeting with Vorys attorneys to discuss case facts and location of assets; discuss case with co-counsel; continued research and review.	Istvan Gajary	3.20	\$250.00	\$800.00
05/18/2023	Drafting Oath and Undertaking. Review of Order Appointing Receiver. Phone call with closing agent re: use of fiduciary deed. Attention to emails with Defendant's counsel re: fees. Review of revised deed.	Jerry E. Peer, Jr.	1.30	\$250.00	\$325.00
05/18/2023	Telephone conference with Jerry Peer; travel to and from the local Huntington National Bank branch and complete the majority of steps in opening one of their Unlimited Plus Business Checking accounts; follow up emails with banker to provide necessary documents to HNB. Assist with finalizing Receiver's Oath and Undertaking, review with JEP; Attention to multiple emails.	Catherine J. Schwartz	3.40	\$125.00	\$425.00
05/18/2023	Continued review of case facts and research into various entities.	Istvan Gajary	4.50	\$250.00	\$1,125.00
05/19/2023	Attention to emails with Greg Peterson; telephone call to Department of Highway Safety and Motor Vehicles Administrative Services in Florida regarding options for electronic submission of a public records request; submit request to dmvrecords@flhsmv.com; emails with Kingsley Musgrave at the Office of General Counsel in Florida. Attention to final	Catherine J. Schwartz	1.00	\$125.00	\$125.00

	banking setup items. Conference with Jerry Peer about next steps.				
05/19/2023	Emails with counsel for Jocelyn Binder.	Gregory Peterson	0.50	\$250.00	\$125.00
05/22/2023	Attention to emails with the Florida Highway Safety and Motor Vehicles records and general counsel offices.	Catherine J. Schwartz	0.30	\$125.00	\$37.50
05/22/2023	Resolve access issues for information from Vorys; extensive review of text messages and related items between J Binder and Silver; identification of napkin agreement between Ms. Binder and Silver on split of sale proceeds from Bayshore and Biscayne Island Ter. properties; telephone with Matt Jalondoni about case; attention to details related to closing at Biscayne Island Ter. property; FedEx deed to title company; obtain and review records from UBS.	Istvan Gajary	8.00	\$250.00	\$2,000.00
05/23/2023	Continued attention to the Florida motor vehicles record request form (HSMV 90510) and various emails; Telephone calls regarding this week's closing.	Catherine J. Schwartz	0.60	\$125.00	\$75.00
05/23/2023	Telephone call with counsel for J Binder; continued review and follow up on numerous receivership items; review social media texts and communications of Binder and Silver.	Istvan Gajary	3.10	\$250.00	\$775.00
05/23/2023	Call with attorney for J. Binder.	Gregory Peterson	1.00	\$250.00	\$250.00
05/24/2023	Letters to vendors providing a copy of the Order appointing receiver. Continued review of bank records. Call with Vorys counsel. Calls with Jerry and Ish on several occasions. Extensive conversations regarding hiring of property manager and securing of property.	Gregory Peterson	2.80	\$250.00	\$700.00
05/24/2023	Meeting with Greg Peterson. Finalize letters and enclosures for the creation of packets, then process them for certified mail to several vendors identified in defendant bank records. Identify Silver's Instagram and related LLC; update GSP. Conference with investigator. Attention to multiple emails.	Catherine J. Schwartz	3.20	\$125.00	\$400.00
05/24/2023	Telephone call and emails with attorney for Miami 555, LLC about foreclosure filing at Bayshore property; continued review of and follow up on various receivership items.	Istvan Gajary	2.80	\$250.00	\$700.00

05/24/2023	Search court records for any pending suits involving defendants.	Jerry E. Peer, Jr.	1.00	\$250.00	\$250.00
05/25/2023	Meeting with Greg to conference regarding Bayshore Drive's current condition, then finalize letters and enclosures for the creation of packets being sent to PayPal, Venmo, Stripe, Cash App, and Zelle; Attention to emails; monitor online banking.	Catherine J. Schwartz	1.60	\$125.00	\$200.00
05/25/2023	Conference call with Ish and Jerry regarding Silver's document production, securing of property and property manager. Discussions regarding status of Miami 2 property.	Gregory Peterson	3.10	\$250.00	\$775.00
05/25/2023	Review of Pristine Management Agreement and email from I Ramirez re: property.	Jerry E. Peer, Jr.	1.10	\$250.00	\$275.00
05/26/2023	Telephone call to Northrup & Johnson, speak with Janet; prepare correspondence, send by certified mail and fax; send confirmation to attorneys. Investigate contact information for ICON Aircraft sales director in the Tampa region, Jen Claymore, and prepare correspondence for email and certified mail. Multiple communications with Attorney Peterson. Organize all contacts into a matrix. Review banking online.	Catherine J. Schwartz	1.60	\$125.00	\$200.00
05/26/2023	Telephone call with Court and second call with Bill Kloss.	Gregory Peterson	1.00	\$250.00	\$250.00
05/26/2023	Telephone call with Jen Claymore of ICON Aircraft.	Gregory Peterson	0.60	\$250.00	\$150.00
05/30/2023	Review of online banking; download delivery confirmations for CashApp, Miami Beach Marina, Stripe, Zelle, and Marine Max East; meeting with Greg Peterson to discuss current status of items, travel arrangements, and Silver's production of documents. Review investigator search results. Submit completed request forms to Florida MV records department. Telephone conference and emails with Ish Gajary regarding financial tracking and next steps.	Catherine J. Schwartz	2.60	\$125.00	\$325.00
06/01/2023	Call with Court, prepare motion to show cause, cross reference two document productions from Silver, search for and secure property manager for California property, Nate Akiva. Multiple conversations with Shellpoint regarding account status for Walnut property. Email	Gregory Peterson	4.60	\$250.00	\$1,150.00

	to John Secrest regarding stay of foreclosure proceedings.				
06/01/2023	Attention to online banking, reconcile May statement; download delivery confirmations for J.T. Contractors and PayPal; review investigator email; begin process of submitting records requests to the California DMV.	Catherine J. Schwartz	0.90	\$125.00	\$112.50
06/02/2023	Telephone call to Nomad Capitalist, preparation of letter to send them Court Order, email the same. Certified Mail letter enc. Order [Doc. 101] to additional entities. Follow up with Florida motor vehicles. Finalize request for records from California DMV. Attention to Auditor report for another CA property that had been purchased by Silver. Conference with Greg Peterson. Emails with attorneys and investigator.	Catherine J. Schwartz	4.60	\$125.00	\$575.00
06/02/2023	Several emails, listening to calls regarding Nomad Capital, several calls with Ish and/or Jerry. Tracking down other global citizen and citizenship by investment companies. Sending Order to same. Conversations regarding CA property and securing residence.	Gregory Peterson	7.40	\$250.00	\$1,850.00
06/02/2023	Draft discussion points for update call with the Court. Emails to Binder's lawyer and real estate agent. Update telephone conference with the Court. Meeting with P G Applegate of the USAO.	Gregory Peterson	5.60	\$250.00	\$1,400.00
06/03/2023	Attention to several emails re: undisclosed property in California. Reviewing and revising management agreement for California properties.	Jerry E. Peer, Jr.	1.50	\$250.00	\$375.00
06/04/2023	Attention to current status of Order mailings.	Catherine J. Schwartz	1.00	\$125.00	\$125.00
06/05/2023	Meet with Attorney Peterson to review status of various items; attention to subpoenas issuance.	Catherine J. Schwartz	1.60	\$125.00	\$200.00
06/05/2023	Conversation with counsel to Jocelyn Binder regarding meeting and several substantive issues including properties, boat and assets of value.	Gregory Peterson	1.00	\$250.00	\$250.00
06/05/2023	Review list of topics to cover and telephone call with GSP; prepare for and attend telephone call with Court to provide update on status of work; meeting with AUSA and	Istvan Gajary	6.70	\$250.00	\$1,675.00

	FBI agent about case; attention to emails related to same; telephone call with numerous people in effort to get documentation on yacht sale; attention to subpoena preparation; telephone call and numerous email correspondence with Silver's lender in effort to obtain documents; continued review of financial records.				
06/06/2023	Deep dive into material from Nomad Capitalists following meeting with AUSAs. Organization and preparation of subpoenas for vendors. Emails to Kristin Hess to arrange meeting on Monday, June 12th. Conference call with property managers and legal counsel in California regarding securing property.	Gregory Peterson	4.60	\$250.00	\$1,150.00
06/06/2023	Review of USPS delivery confirmations and update matrix accordingly. Attention to subpoenas: engage Statewide Process Service for delivery upon J.T. Contractors and their Statutory Agent/President, Oscar Torres in FL; engage Process Service Associates for delivery upon Happy Jewelers Statutory Agent Gabriyel Arik in CA. Conference with attorneys. Attention to multiple emails.	Catherine J. Schwartz	2.70	\$125.00	\$337.50
06/06/2023	Prepare and file motion for reappointment of receiver to include newly discovered (and previously undisclosed) fourth property; telephone call with prospective local counsel in California and property manager in effort to secure and evict tenants; continued review of financial records; attention to numerous related telephone calls and emails; telephone call with KabCo Kitchens owner Carlos.	Istvan Gajary	7.00	\$250.00	\$1,750.00
06/06/2023	Discuss necessity of reappointment to include newly discovered property, review, edit and file.	Gregory Peterson	0.80	\$250.00	\$200.00
06/07/2023	Review status and tend to multiple open items, including mailings, banking, appointment on 4th CA property, FL vehicle records requests and subpoenas. Engage One Hour Legal Service for delivery upon ICON Aircraft Statutory Agent Simi Gupta in CA; Process Service Associates for delivery upon Henley & Partners Statutory Agent CT Corp. in CA and delivery upon Beverly Hills Ducati, CA; Statewide Process Service for delivery upon Henley & Partners Statutory Agent	Catherine J. Schwartz	2.90	\$125.00	\$362.50

	CT Corp. in FL. Prepare packet to Beverly Hills Ducati enc. claim form, Court Order [Doc. 101] and a subpoena duces tecum.				
06/07/2023	Meeting with K Schwartz for issuing of subpoenas.	Gregory Peterson	1.00	\$250.00	\$250.00
06/08/2023	Telephone call with FL motorist service specialist and intake of motor vehicle and vessel records; record USPS delivery and Process Server confirmations. Assist with subpoena to Shellpoint.	Catherine J. Schwartz	0.90	\$125.00	\$112.50
06/08/2023	Research re: notices to be filed in each district.	Jerry E. Peer, Jr.	1.50	\$250.00	\$375.00
06/09/2023	Meeting with I Gajary, service of subpoenas on all parties and counsel, attention to deliveries.	Catherine J. Schwartz	0.90	\$125.00	\$112.50
06/09/2023	Continued follow up with local counsel on filing receivership paperwork in California and Florida district courts; follow up with K Schwartz on service of subpoenas issued this week; follow up with property manager in California for Walnut Ave. property on various receivership items.	Istvan Gajary	3.10	\$250.00	\$775.00
06/09/2023	Review of Hunt Ortman engagement letter.	Jerry E. Peer, Jr.	0.20	\$250.00	\$50.00
06/11/2023	Travel to Florida. Meeting with team to outline course of time in Florida.	Gregory Peterson	7.10	\$250.00	\$1,775.00
06/11/2023	Prepare for trip to Miami and travel to Miami; review and prepare for interviews with various individuals.	Istvan Gajary	7.00	\$250.00	\$1,750.00
06/11/2023	Finish initial probate forms and email same to client for signatures; review various associated docs.	Istvan Gajary	1.80	\$250.00	\$450.00
06/12/2023	Send Order and Amendment to Chase and Wise.	Catherine J. Schwartz	0.80	\$125.00	\$100.00
06/12/2023	Meeting with Binder and counsel. Meeting with Kristin Hess. Meeting at Bayshore property with contractor, real estate agent and property manager. Search through personal items abandoned at the property. Meeting at Biscayne Island Terrace property.	Gregory Peterson	9.70	\$250.00	\$2,425.00
06/12/2023	Interviews with Jocelyn Binder, realtor Kristen Hess, contractor and property manager for Bayshore property; inspection of Bayshore property and examination of personal property items for relevant asset information.	Istvan Gajary	10.00	\$250.00	\$2,500.00

06/13/2023	Attention to many email communications with our attorneys on location in Florida as well as with supporting counsel in Pasadena, California, responding as necessary with information from our files, and intake of filed documents in district courts; updated certified mail tracking.	Catherine J. Schwartz	1.20	\$125.00	\$150.00
06/13/2023	Follow up meeting with Hess, recovery of several personal items, return to Bayshore property to continue search of personal property and records. Travel home from Florida.	Gregory Peterson	7.50	\$250.00	\$1,875.00
06/13/2023	Continued examination of personal property items at Bayshore property in effort to locate asset information; second meeting with Kristen Hess to review additional personal property items; travel back to Columbus.	Istvan Gajary	8.00	\$250.00	\$2,000.00
06/14/2023	Intake and review of San Diego County Recorder's Office documents and Ft. Lauderdale counsel's filings; emails with Atty. Gajary.	Catherine J. Schwartz	0.40	\$125.00	\$50.00
06/14/2023	Telephone calls with various individuals about receivership items; oranziation of items and details from Miami trip; attention to related emails.	Istvan Gajary	3.50	\$250.00	\$875.00
06/15/2023	Conference with Atty. I Gajary to discuss matters and next steps, which include a subpoena to California Car Company for information related to \$25,000 paid December 2021 and continuation of IG's work in reviewing all bank statements line by line, identifying anything of note including payments to J Binder, purchases for J Binder, and payments to JT Contractors.	Catherine J. Schwartz	2.10	\$125.00	\$262.50
06/15/2023	Summary entry to capture multiple conversations, emails, etc. regarding subpoenas to Happy Jewelers, ICON Aircraft, UBS, Hensley, and multiple other exchanges. Further detail can be provide upon request.	Gregory Peterson	3.00	\$250.00	\$750.00
06/15/2023	Prepare various schedules related to Silver expenditures; attention to emails with California counsel; review of additional items from Vorys; attention to various emails and texts with GSP and JEP about recievership matters.	Istvan Gajary	3.60	\$250.00	\$900.00
06/16/2023	Telephone calls with Henley & Partners	Catherine J. Schwartz	2.50	\$125.00	\$312.50

	and JP Morgan Chase Bank; emails with Wells Fargo; prepare subpoenas for other banks and emails with attorneys; continue to work with I Gajary on line by line review of bank statements and update of charts, accordingly.				
06/16/2023	Telephone call with LynAlise Tannery, Lead Counsel at Wells Fargo	Gregory Peterson	0.30	\$250.00	\$75.00
06/16/2023	Attention to numerous details related to receivership; prepare detailed email to attorney for Binder about receivership assets; update schedule of cash transfers to Binder from Silver; detailed review of bank statements to same; attention to emails with KS related to Binder transfers and gifts and various subpoenas; review of text messages between Binder and Mannette.	Istvan Gajary	6.50	\$250.00	\$1,625.00
06/17/2023	Review mailings and subpoenas out to date, update GSP. Continue to review bank records and update lists.	Catherine J. Schwartz	1.20	\$125.00	\$150.00
Services Subtotal					\$49,962.50

Expenses

Date	Notes	Quantity	Rate	Total
05/17/2023	Park Columbus, parking for today's meeting at Vorys	1.00	\$3.25	\$3.25
05/18/2023	Purchase of postage: service of Receiver's Oath upon Defendants	5.00	\$0.60	\$3.00
05/23/2023	Payment to FedEx for overnight delivery of executed deed to Ms. Dina Nerdinsky in Sevierville, TN	1.00	\$54.80	\$54.80
05/24/2023	Purchase of certified mail postage for packets to vendors: Happy Jewelers, J.T. Contractors, Inc., KabCo Kitchens, Marine Max East, Miami Beach Marina, and Samy's Camera	7.00	\$5.89	\$41.23
05/25/2023	Purchase of certified mail postage for packets to: Cash App, PayPal, Stripe, Venmo, and Zelle	5.00	\$5.89	\$29.45
05/25/2023	Purchase of regular mail postage for packets to: Cash App and Venmo	2.00	\$1.74	\$3.48
05/26/2023	Purchase of certified mail postage for packets to: Northrup & Johnson and ICON Aircraft	2.00	\$5.89	\$11.78
05/30/2023	American Airlines: purchase of roundtrip airfare for three between Columbus, Ohio and Miami, Florida	1.00	\$3,190.00	\$3,190.00
06/01/2023	Purchase of certified mail postage for packet of requests to: State	1.00	\$5.65	\$5.65

	of California Department of Motor Vehicles			
06/01/2023	Payment to California Department of Motor Vehicles for record request production fee	1.00	\$5.00	\$5.00
06/01/2023	Expedia: payment for hotel stays	1.00	\$718.74	\$718.74
06/01/2023	May 2023 investigative services: Sauer & Associates	1.00	\$940.00	\$940.00
06/02/2023	Payment to Verihull LLC for access to data from BoatHistoryReport.com	1.00	\$59.99	\$59.99
06/02/2023	California Accessor: payments for ParcelQuest access to Ramona and Venice properties	2.00	\$14.95	\$29.90
06/06/2023	Payment to Statewide Process Service, Inc. for subpoena delivery upon J.T. Contractors, Inc. at 2051 NW 88 Way, Pembroke Pines, FL	1.00	\$95.00	\$95.00
06/06/2023	Payment to Process Service Associates for subpoena delivery upon Newport Jewelers By Gabe Arik dba Happy Jewelers at 535 N. Trayer Avenue, Glendor, CA	1.00	\$95.00	\$95.00
06/06/2023	Payment to San Diego County Recorder for copies of three documents; 2022-0311015, 2022-0311016, and 2022-0475312	1.00	\$7.65	\$7.65
06/06/2023	Payment to the County of San Diego, California recorder's office	1.00	\$7.82	\$7.82
06/07/2023	Payment to One Hour Legal Service for subpoena delivery upon ICON Aircraft at 2141 Icon Way, Vacaville, CA	1.00	\$125.00	\$125.00
06/07/2023	Payment to Process Service Associates for subpoena delivery upon CT Corporation Service for Henley & Partners USA Inc. at 330 N. Brand Blvd., Glendale, CA	1.00	\$95.00	\$95.00
06/07/2023	Purchase of certified mail postage for delivery to Beverly Hills Ducati	1.00	\$6.13	\$6.13
06/08/2023	Payment of Florida Highway Safety and Motor Vehicles invoice for records of B Silver, J Binder, Eclipse Home Design LLC, and Collateral Damage LLC	1.00	\$56.00	\$56.00
06/09/2023	Payment to FedEx	1.00	\$32.95	\$32.95
06/11/2023	Payment to American Airlines for baggage charge	1.00	\$30.00	\$30.00
06/11/2023	Eddie George's Grill: payment of dinner for three at Columbus airport	1.00	\$100.00	\$100.00
06/12/2023	Purchase of postage for certified mailing of Order and Amendment to Chase Bank	1.00	\$5.89	\$5.89
06/12/2023	Payment to Hunt Ortman Palfy Nieves Darling & Mah law firm in Pasadena, CA for the legal services of attorney Peter Schnaitman	1.00	\$500.00	\$500.00
06/12/2023	Payment to Holiday Inn for two breakfast meals	2.00	\$19.05	\$38.10
06/12/2023	Shuckers restaurant: group dinner for three	1.00	\$416.38	\$416.38

Invoice # 7001 - 06/23/2023

06/13/2023	Payment to American Airlines for baggage charge	1.00	\$30.00	\$30.00
06/13/2023	Payment to Holiday Inn for breakfast meal items	1.00	\$43.56	\$43.56
06/16/2023	Staples: purchase of external hard drive storage for housing large volume of electronic materials	1.00	\$144.03	\$144.03
			Expenses Subtotal	\$6,924.78
			Subtotal	\$56,887.28
			Total	\$56,887.28

Statement of Account

Outstanding Balance	New Charges	Amount in Trust	Payments Received	Total Amount Outstanding
(\$0.00	+ \$56,887.28) - (\$0.00	+ \$0.00) = \$56,887.28

Please make all amounts payable to: Peterson Connors LLP

Payment is due upon receipt.

Payments more than 30 days overdue incur 1.5% per month interest charges.

Please notify us if your contact information has changed.

Our Tax ID: 20-8129097